

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

RIMSYS, INC.,)	
)	
Plaintiff,)	Civil Action No. 2:23-cv-01630-WSH
)	
v.)	
)	
KAREN COHN,)	
)	
Defendant.)	

**MOTION TO EXTEND
TEMPORARY RESTRAINING ORDER**

Plaintiff Rimsys, Inc. (“Rimsys”), by and through its undersigned counsel, files this Motion to Extend Temporary Restraining Order (“TRO”) pursuant to Rule 65(b)(2), respectfully requesting that this Court extend the TRO currently in place for an additional 14 days from its original expiration date of September 29, 2023. In support thereof, Rimsys alleges as follows:

1. On September 11, 2023, Rimsys commenced this action by filing a Verified Complaint and Motion for TRO and Preliminary Injunction. *See* ECF Nos. 1 and 4.
2. By Order dated September 15, 2023, this Court entered a TRO prohibiting Defendant Karen Cohn (“Cohn”) from, *inter alia*, working for Veeva Systems, Inc. (“Veeva”), through at least September 29, 2023, at 10:59 a.m. *See* ECF No. 18.
3. In that Order, this Court determined that: (1) Rimsys had established a likelihood of success on the merits; (2) Rimsys would suffer irreparable harm if the TRO were denied; (3) granting the TRO would not result in irreparable harm to Cohn; and (4) granting the TRO was in the public interest. *See* ECF No. 18.
4. Since that time, the parties have undertaken expedited discovery, which continues.

5. The parties submitted a Joint Status Report to the Court on September 27, 2023, which sets forth in detail their respective positions as to an extension of the TRO. *See* ECF No. 32.

6. For all of the reasons set forth in Section IV.A. of the Joint Status Report, Rimsys asks this Court to extend the current TRO for an additional 14 days, as permitted by Fed. R. Civ. P. 65(b)(1), for good cause shown.

7. Cohn does not consent to an extension of the TRO.

8. If the TRO is not extended, Rimsys will suffer immediate and irreparable harm and will not have an adequate remedy at law because Cohn will resume the unfair use and misappropriation of Rimsys' Confidential Information and Trade Secrets on behalf of herself and her new employer, Veeva Systems, Inc. ("Veeva"), thereby eroding Rimsys' competitive advantage and unfairly competing with Rimsys.

9. Cohn, on the other hand, will suffer no harm because Veeva continues to retain her position and pay her full salary while these proceedings are pending.

WHEREFORE, for the reasons set forth in above and in Section IV.A. of the Joint Status Report, ECF No. 32, which is incorporated herein by reference, this Court should enter the attached Order, extending the expiration date of the TRO from September 29, 2023, to October 13, 2023.

Dated: September 28, 2023

Respectfully submitted,

MEYER, UNKOVIC & SCOTT LLP

By: /s/ Antoinette C. Oliver

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ATTORNEYS FOR PLAINTIFF

RIMSYS, INC.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 28, 2023, the foregoing **MOTION TO EXTEND TEMPORARY RESTRAINING ORDER** was electronically filed and served by use of the Court's ECF system.

/s/Antoinette C. Oliver
Antoinette C. Oliver